

*HUSA AD*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Elvira PARAMO-Bustos

Defendant.

Magistrate Case No.:

**'08 MJ 8599**

COMPLAINT FOR VIOLATION OF


21 U.S.C. § 952 and 960

Importation of a Controlled Substance  
(Felony)

The undersigned complainant being duly sworn states:

On or about July 2, 2008, within the Southern District of California, defendant Elvira PARAMO-Bustos did knowingly and intentionally import approximately 52.86 Kilograms (116.29 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
\_\_\_\_\_  
Douglas A. Struckmeyer  
Special Agent  
U.S. Immigration & Customs  
Enforcement

SWORN TO, BEFORE ME, AND SUBSCRIBED IN MY PRESENCE THIS 3<sup>rd</sup>  
DAY OF JULY, 2008.

  
\_\_\_\_\_  
PETER C. LEWIS  
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Elvira PARAMO-Bustos

4  
5 STATEMENT OF FACTS

6 This complaint is based upon the personal observations, investigation and  
7 information provided to U.S. Immigration and Customs Enforcement Special Agent  
8 Douglas Struckmeyer.

9 On July 2, 2008, Elvira PARAMO-Bustos entered the United States at the  
10 Calexico, California, East Port of Entry. PARAMO was the driver and sole occupant of  
11 a 1997 Pontiac Transport registered in her name. Customs and Border Protection  
12 Officer (CBPO) J. Mendez received a negative Customs declaration from PARAMO.  
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14 During the primary inspection CBPO Mendez noticed discrepancies in the floor in  
15 the rear of the vehicle. PARAMO also noticed the carpet appeared to have been  
16 previously removed, and was loose at the sides. Based on her observations, CBPO  
17 Mendez referred PARAMO and the vehicle to the secondary inspection area for further  
18 inspection.  
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20 CBPO Molina encountered PARAMO and the vehicle in the secondary  
21 inspection area. CBPO Molina received a negative Customs declaration from  
22 PARAMO. CBPO Molina conducted a short immigration inspection of PARAMO, during  
23 which he noticed that her hands were visibly shaking and she was avoiding eye contact.  
24 CBPO Molina asked PARAMO to exit the vehicle and open the hood and the rear door  
25 of the vehicle. PARAMO partially complied, but failed to open the rear door. CBPO  
26 Molina again instructed PARAMO to open the rear door of the vehicle. At that time,  
27 PARAMO opened the rear door, allowing CBPO Molina to fully inspect the vehicle.  
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1       Upon inspecting the rear of the vehicle, CBPO Molina lifted up the carpet and  
2 saw what appeared to be a compartment containing numerous packages. CBPO  
3 Molina escorted PARAMO to the Vehicle Secondary Office, and then returned to  
4 continue inspecting the vehicle. Upon further inspection, he found 42 packages hidden  
5 within a compartment in the floor, as well as 8 additional packages hidden within the  
6 rear quarter panels of the vehicle. The packages contained a green leafy substance  
7 which field-tested positive for marijuana. The total weight of the packages was 52.86  
8 Kilograms (116.29 pounds).  
9

10       Special Agent's (SA) D. Struckmeyer advised PARAMO of her rights per  
11 Miranda. PARAMO stated she understood her rights and was willing to answer  
12 questions without the presence of an attorney.  
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14       PARAMO stated she was hired to smuggle the marijuana into the United States  
15 by her daughter's boyfriend, Abraham RODRIGUEZ. PARAMO said RODRIGUEZ  
16 promised to pay her for smuggling the marijuana, but he never told her how much she  
17 would be paid. PARAMO said that he never specifically told her what was going to be  
18 concealed within the vehicle, but she believed that it would be marijuana.  
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